

1 RENE L. VALLADARES
2 Federal Public Defender
3 Nevada State Bar No. 11479
4 MARGARET W. LAMBROSE
5 Assistant Federal Public Defender
6 Nevada State Bar No. 11626
7 411 E. Bonneville, Ste. 250
8 Las Vegas, Nevada 89101
9 (702) 388-6577/Phone
10 (702) 388-6261/Fax
11 Maggie_lambrose@fd.org

12 Attorney for Mario Alberto Bojorquez-Manrique

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 UNITED STATES OF AMERICA,

16 Case No. 2:19-cr-00153-APG-DJA

17 Plaintiff,

18 **STIPULATION TO CONTINUE**
19 **MOTION DEADLINES**
20 (Third Request)

21 v.
22 MARIO ALBERTO BOJORQUEZ-
23 MANRIQUE,

24 **ORDER**

25 Defendant.

26
17 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.
18 Trutanich, United States Attorney, and Robert Krief, Assistant United States Attorney, counsel
19 for the United States of America, and Rene L. Valladares, Federal Public Defender, and
20 Margaret W. Lambrose, Assistant Federal Public Defender, counsel for Mario Alberto
21 Bojorquez-Manrique, that the pretrial motion deadline be continued thirty (30) days.
22

23 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
24 shall have to and including January 2, 2020, to file any and all pretrial motions and notice of
25 defense, currently due November 25, 2019.
26

1 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
2 shall have to and including January 16, 2020, to file any and all responsive pleadings, currently
3 due December 9, 2019.

4 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
5 shall have to and including January 23, 2020, to file any and all replies to dispositive motions,
6 currently due December 16, 2019.

7 1. Counsel for the defendant needs additional time to conduct investigation in this
8 case in order to determine whether there are any pretrial issues that must be litigated and
9 whether the case will ultimately go to trial or will be resolved through negotiations.

10 2. The defendant is incarcerated and does not object to the continuance.

11 3. The parties agree to the continuance.

12 4. The additional time requested herein is not sought for purposes of delay, but
13 merely to allow counsel for defendant sufficient time within which to be able to effectively and
14 complete investigation of the discovery materials provided.

15 5. Additionally, denial of this request for continuance could result in a miscarriage
16 of justice.

17 This is the third stipulation to continue filed herein.

18 DATED this 25th day of November, 2019.

19 RENE L. VALLADARES
20 Federal Public Defender

21 NICHOLAS A. TRUTANICH
22 United States Attorney

23 By /s/ Margaret W. Lambrose
24 MARGARET W. LAMBROSE
25 Assistant Federal Public Defender

26 By /s/ Robert Knief
27 ROBERT KNIEF
28 Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

V.

MARIO ALBERTO BOJORQUEZ-
MANRIQUE,

Defendant.

Case No. 2:19-cr-00153-APG-DJA

FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Counsel for the defendant needs additional time to conduct investigation in this case in order to determine whether there are any pretrial issues that must be litigated and whether the case will ultimately go to trial or will be resolved through negotiations.

2. The defendant is incarcerated and does not object to the continuance.

3. The parties agree to the continuance.

4. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for defendant sufficient time within which to be able to effectively and complete investigation of the discovery materials provided.

5. Additionally, denial of this request for continuance could result in a miscarriage of justice.

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ORDER

IT IS THEREFORE ORDERED that the parties herein shall have to and including January 2, 2020 to file any and all pretrial motions and notice of defense.

IT IS FURTHER ORDERED that the parties shall have to and including January 16, 2020 to file any all responses.

IT IS FURTHER ORDERED that the parties shall have to and including January 23, 2020 to file any and all replies.

Dated: November 25, 2019.

UNITED STATES DISTRICT JUDGE